

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, et al.,

Plaintiffs

v.

TYRRELL L. GARTH, et al.,

Defendants.

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Civil Action No. 4:24-cv-02767

**DECLARATION OF ERIC D. WADE**

My name is Eric D. Wade. I am more than twenty-one years of age. I am of sound mind and competent to make this Declaration. I have personal knowledge of the facts stated herein, and I can attest that they are true and correct.

1. I am a partner at the law firm of Porter Hedges LLP, located at 1000 Main Street, 36th Floor, Houston, Texas 77002-6336. I previously served as one of the attorneys of record for Starrex International, Ltd.; Starrex Insurance Holdings, Inc.; Starrex Holdings, Inc.; Starrex Insurance Services, Inc.; and Starrex Technical Services, LLC (collectively, “Starrex”) in the case pending as Cause No. 2023-85306, *Starrex International, Ltd., et al. v. Coast to Coast Title, LLC, et al.*, in the 11th District Court of Harris County, Texas (the “Starrex Litigation”). Simon W. Hendershot, Ian F. McNeil, and Philip Racusin of Hendershot Cowart P.C. represented Coast to Coast Title, LLC; Sol City Title, LLC; Magnolia Title Arkansas, Ltd.; and Magnolia Title Florida (the “Magnolia Companies”) in the Starrex Litigation.

2. I am a licensed attorney in the State of Texas, and I have personal knowledge of and am personally acquainted with the discovery taken and documents produced in the course in the Starrex Litigation.

3. The following documents that are attached as exhibits to Tyrrell L. Garth and Phillip H. Clayton's Motion for Sanctions are true and correct copies of documents previously produced in the Starrex Litigation prior to the date on which Second Amended Complaint in above-captioned lawsuit was filed on February 28, 2025. Documents bearing the Bates prefix "STARREX" were produced by Starrex. Documents bearing the Bates prefix "COAST" were produced by the Magnolia Companies:

EXHIBIT B	STARREX013237-013238
EXHIBIT D	COAST005542-45
EXHIBIT E	COAST006079-006279
EXHIBIT F	COAST005592-93
EXHIBIT G	STARREX000044
EXHIBIT H	STARREX009849-009851
EXHIBIT I	STARREX001185-001187
EXHIBIT J	COAST008705-008706
EXHIBIT K	COAST008714
EXHIBIT L	COAST015256-59
EXHIBIT M	STARREX042425 STARREX043263 STARREX042431
EXHIBIT N	STARREX000049
EXHIBIT O	STARREX011864

EXHIBIT P	COAST012018
EXHIBIT Q	STARREX027021

**JURAT**

My name is Eric D. Wade, my date of birth is April 10, 1970, and my address is 1000 Main Street, 36th Floor, Houston, Texas 77002-6336. I declare under penalty of perjury that the foregoing is true and correct.

Executed by Amy Parker Beeson with my permission in Harris County, State of Texas on the 21st day of March, 2025.

/s/ Eric D. Wade  
Eric D. Wade, Declarant